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IN THE UNITED STATES DISTRICT COURT
DISTRICT OF UTAH

UNITED STATES OF AMERICA,

Plaintiff,

vs.

APRIL GREN BAWDEN,
CHAD AUSTIN BAWDEN,
MAKAIO. LYMAN CRISLER,
PHILLIP GANNUSCIA,
DUSTIN GARR, BARBARA JO
JACKSON, BRENT GOLDBURN
KNUDSON, ROBERT MCKINLEY, and
RICHARD SCOTT NEMROW,

Defendants.

Case No. 2:22CR00481 CW

FIRST BILL OF PARTICULARS

Judge Clark Waddoups

The United States of America hereby files the following First Bill of Particulars for
Forfeiture of Property.

The United States hereby gives notice that in accordance with its Notice of Intent to Seek
Forfeiture in the Indictment, the United States provides the following updated list of assets for
which it seeks forfeiture under 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c), 18 U.S.C. §
982(a)(1) and 18 U.S.C. § 982(b) and 21 U.S.C. § 853(p):

- Real Property located at 229 E 60 N Lindon, UT 84042, legally described as:

The following lands lying in Utah County, UT:

All of Lot 1, KYSER MEADOWS SUBDIVISION, according to the official plat thereof, on file and of record in the office of the Utah County Recorder, State of Utah.

Tax ID: 44-187-0001

- All funds in account ending 2846 in the name of Target Fulfillment, LLC at Rock Canyon Bank;
- All funds in account ending 8710 in the name of Target Fulfillment, LLC at Rock Canyon Bank;
- All funds in account ending 8285 in the name of Energia, LLC at Central Bank;
- All funds in account ending 5277 in the name of Elite Business Resources, LLC at America First Credit Union;
- All funds in account ending 8372 in the name of Elite Business Resources, LLC at Chase Bank;
- Nautique Paragon 25 boat and trailer, VIN: USCTC1R005E021;
- Porsche 911 convertible, VIN: WP0CB2A96LS263604;
- Lamborghini Urus, VIN: ZPBUA1ZL7MLA13133;
- A money judgment equal to the value of any property not available for forfeiture as a result of any act or omission of the defendant(s) for one or more of the reasons listed in 21 U.S.C. § 853(p).

Respectfully submitted this 14th day of December, 2022.

TRINA A. HIGGINS
United States Attorney

/s/ Cy H. Castle
CY H. CASTLE
Assistant U.S. Attorney